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US DISTRICT COURT E.D.N.Y.

★ NOV 23 2011

BROOKLYN OFFICE

United States District Court
Eastern District of New York

Ann Burton,
Plaintiff,

- Against -

Silvercrest Center for
Nursing and Rehabilitation,
et al.,

Defendants.

Notice of Motion to
Terminate Deposition,
and Compel Discovery/
Document Production,
and for Protective Order.
11-CV-1417 (SLT) (LB)

Judge Townes,

Please take notice that upon the annexed affirmation of Ann Burton on November 15, 2011, and upon the exhibits attached thereto, and the pleadings herein, Pltff will move this Court, before Judge Townes, United States District Judge, for an order pursuant to Rules 26-32, and 37 of the Federal Rules of Civil Procedure granting:

1. Motion to Compel Discovery Production from Silvercrest Center for Nursing and Rehabilitation, et. al.; AFG 1988, et. al.; Eric Shenese et. al.; White Glove Placement, et. al.; N.Y.S. Department of Labor et. al.; State Education Department, Office of Professional Discipline, et. al.; Dr. Russell Beckhardt, Ear, Nose, & Throat, 738 Franklin Avenue, Franklin Square, NY 11010, and Dr.

Da Cunha Trustan, Jamaica Medical Care, 172-06 Jamaica Ave, Jamaica, NY 11432, and The City of NY, Dept of Health, N.Y.P.D., Dept of Environment Protection, 311, and 911.

2. Silvercrest Center for Nursing and Rehabilitation, et. al.; deposed P14 regarding the aforementioned parties and documentary evidence, which was stolen, and which P14 has been unable to access. In the absence of the said discovery and order P14's rights are hindered.

3. P14 submitted four interrogatory and discovery responses to 11-cv-1417 def's, which evoked no response.

4. P14 moves the Court to address P14's objections to the 11-cv-1417 def's failure to respond to P14's Confidentiality Stipulation, regarding medical release or authorization, and stolen documents.

5. P14 moves the Court to terminate the discovery on the grounds that it was conducted in bad faith; with a fraudulent Notice of Deposition; deposed irrelevant questions, eg: a computer purchased after termination, my daughter's name and address, and when P14 married and married name.

6. Pltf moves the Court to terminate the deposition and discovery on the grounds that it is being conducted in bad faith, and a manner that unreasonably annoys, embarrasses, or oppresses pltf, eg: Alesia Kantor asked, "Has anyone told you that you have a memory problem?" and that pltf is a Registered Nurse and does not know what is the specialty of my physicians.

7. Pltf moves the Court to terminate the deposition and discovery on the grounds that questions conducted are unduly burdensome, and can be obtained by other means, eg: "411" for physicians addresses, other civil actions which even Judge Bloom had to Order Alesia Kantor to access the "public record."

8. Pltf moves the Court to terminate the deposition and discovery on the grounds that questions conducted were non-beneficial, and per Alesia Kantor demanded "Yes" or "No" answers, which violates discovery Rules.

9. Pltf moves the Court to redact my daughters' personal information from the record.

Despite pltf's medical problems, etc., pltf made a good

faith effort to attend a bad faith deposition.

WHEREFOR, p11f moves the Court for a Motion to Compel documents and to terminate deposition.

I declare under penalty of perjury that the foregoing is true and correct.

Respectfully submitted,
Ann Burton Pro Se
196-15E 65th Crescent #1B
Fresh Meadows, NY 11365

Dated: Fresh Meadows, NY
November 15, 2011

I certify that a copy has been mailed via ^{Fd Exp} ~~US~~ ^{11/15/11} mail to depts at Nixon Peabody,
~~Class USPT~~ 50 Tencho Quadrangle, Ste 300, Tencho, NY 11753, on
November 15, 2011.

Ann Burton Pro Se

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U.S. District Court - E.D.N.Y.
225 Cadogan Plaza East
Brooklyn, NY 11201

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Jed & Tessa
Pro Se Eff 10

